

ADAM R.F. GUSTAFSON, Principal Deputy Assistant Attorney General
United States Department of Justice
Environment & Natural Resources Division

DANIEL LUECKE (CA Bar No. 326695)
Natural Resources Section
Ben Franklin Station, P.O. Box 7611
Washington, DC 20044-7611
Tel: (202) 598-7863 (Luecke)
Fax: (202) 305-0275
Email: daniel.luecke@usdoj.gov

Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL DIVERSITY;
WISHTOYO FOUNDATION,

Plaintiffs,

v.

DOUG BURGUM, et al.,

Federal Defendants,

and

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

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) Case No. 2:24-cv-05459-MWC-
) MAA
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) **FEDERAL DEFENDANTS’**
) **ANSWER TO SECOND**
) **SUPPLEMENTAL AND**
) **AMENDED COMPLAINT**
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Federal Defendants Doug Burgum, in his official capacity as Secretary of the
United States Department of the Interior; the Bureau of Safety and Environmental

1 Enforcement (“BSEE”); and Bobby Kurtz, in his official capacity as Acting BSEE
2 Pacific Regional Director submit the following Answer to Plaintiffs Center for
3 Biological Diversity and Wishtoyo Foundation’s Second Supplemental and
4 Amended Complaint for Declaratory and Other Relief (ECF No. D-104). The
5 paragraph numbers in the Answer correspond to the paragraph numbers in
6 Plaintiffs’ Second Supplemental and Amended Complaint.

7 INTRODUCTION

8 1. Federal Defendants deny the allegations in Paragraph 1.

9 2. Federal Defendants aver regarding the first sentence of Paragraph 2
10 that ExxonMobil shut down its oil and gas operations in the Santa Ynez Unit in
11 2015 due to a ruptured onshore pipeline. Federal Defendants admit the allegations
12 in second sentence of Paragraph 2. Federal Defendants admit the allegations in the
13 third sentence of Paragraph 2. Federal Defendants admit that the spill killed birds
14 and marine mammals and closed beaches and fisheries along the coast but lack
15 information and knowledge sufficient to form a belief as to the truth of the
16 remaining allegations in the third sentence of Paragraph 2 and deny them on that
17 basis.

18 3. Federal Defendants admit the allegations in Paragraph 3.

19 4. The allegations in Paragraph 4 are legal conclusions to which no
20 response is required. To the extent a response is required, Federal Defendants deny
21 the allegations in Paragraph 4.

22 5. The allegations in Paragraph 5 are vague and ambiguous. Federal
23 Defendants therefore lack knowledge or information sufficient to form a belief
24 about the truth of the allegations and deny them on that basis.

25 6. The allegations in the first and second sentences of Paragraph 6 are
26 conclusions of law that require no response. To the extent a response is required,
27 Federal Defendants deny the allegations in the first and second sentences of
28

1 Paragraph 6. Federal Defendants deny the allegations in the third sentence of
2 Paragraph 6.

3 7. Federal Defendants deny the allegations in Paragraph 7.

4 8. Federal Defendants deny the allegations in Paragraph 8.

5 9. The allegations in Paragraph 9 are conclusions of law that require no
6 response. To the extent a response is required, Federal Defendants deny the
7 allegations in Paragraph 9.

8 10. Federal Defendants admit the allegations in Paragraph 10.

9 11. The allegations in the first sentence of paragraph 11 are conclusions
10 that require no response. Federal Defendants deny the allegations in the second
11 sentence of Paragraph 11.

12 12. Federal Defendants deny the allegations in Paragraph 12.

13 13. Federal Defendants deny the allegations in Paragraph 13.

14 14. Federal Defendants deny the allegations in the first sentence of
15 Paragraph 14. The allegations in the second sentence of Paragraph 14 are vague
16 and ambiguous. Federal Defendants therefore lack knowledge or information
17 sufficient to form a belief about the truth of the allegations and deny them on that
18 basis.

19 15. The allegations in Paragraph 15 characterize Plaintiffs' lawsuit and
20 require no response.

21 16. Federal Defendants aver that on May 28, 2025, BSEE issued both an
22 EA and FONSI under the National Environmental Policy Act ("NEPA") and that it
23 also reaffirmed its decision to extend the leases on May 29, 2025. The remaining
24 allegations in Paragraph 16 are vague and ambiguous. Federal Defendants
25 therefore lack knowledge or information sufficient to form a belief about the truth
26 of the allegations and deny them on that basis.

27 17. Federal Defendants admit the allegations in Paragraph 17.
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18. The allegations in Paragraph 18 purport to characterize a July 25, 2025 BSEE press release, which speaks for itself and is the best evidence of its contents. Any allegations contrary to the plain language of the press release are denied.

19. The allegations in Paragraph 19 characterize Plaintiffs' lawsuit and require no response.

20. The allegations in Paragraph 20 are vague and ambiguous. Federal Defendants therefore lack knowledge or information sufficient to form a belief about the truth of the allegations and deny them on that basis.

JURISDICTION AND VENUE

21. The allegations in Paragraph 21 are conclusions of law that require no response. To the extent a response is required, Federal Defendants admit jurisdiction is proper and deny the remaining allegations.

22. The allegations in Paragraph 22 are conclusions of law that require no response. To the extent a response is required, Federal Defendants admit venue is proper and deny the remaining allegations.

23. The allegations in Paragraph 23 are conclusions of law that require no response. To the extent a response is required, Federal Defendants admit this Court has subject matter jurisdiction and deny the remaining allegations.

PARTIES

24. Federal Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 24 and deny them on that basis.

25. Federal Defendants lack information and knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 25 and deny them on that basis.

1 26. Federal Defendants lack information and knowledge sufficient to form
2 a belief as to the truth of the allegations in Paragraph 26 and deny them on that
3 basis.

4 27. Federal Defendants lack information and knowledge sufficient to form
5 a belief as to the truth of the allegations in Paragraph 27 and deny them on that
6 basis.

7 28. Federal Defendants lack information and knowledge sufficient to form
8 a belief as to the truth of the allegations in Paragraph 28 and deny them on that
9 basis.

10 29. Federal Defendants lack information and knowledge sufficient to form
11 a belief as to the truth of the allegations in Paragraph 29 and deny them on that
12 basis.

13 30. Federal Defendants lack information and knowledge sufficient to form
14 a belief as to the truth of the allegations in Paragraph 30 and deny them on that
15 basis.

16 31. The allegations in the first and second sentences of Paragraph 31 are
17 vague and ambiguous and on that basis the Federal Defendants deny them.
18 However, Federal Defendants aver that certain oil and gas activities inherently
19 present a risk of oil spills, and those risks are minimized through proper
20 monitoring, maintenance, and BSEE oversight of operations and facilities.

21 32. Federal Defendants lack information and knowledge sufficient to form
22 a belief as to the truth of the allegations in Paragraph 32 and deny them on that
23 basis.

24 33. Federal Defendants admit that approving the permits aids in restarting
25 oil and gas activities. The remaining allegations in Paragraph 33 are vague and
26 ambiguous, and Federal Defendants therefore lack knowledge or information
27 sufficient to form a belief about the truth of the allegation and deny them on that
28 basis.

1 34. The allegations in Paragraph 34 are vague and ambiguous. Federal
2 Defendants therefore lack knowledge or information sufficient to form a belief
3 about the truth of the allegation and deny them on that basis.

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5 35. Federal Defendants lack information and knowledge sufficient to form
6 a belief as to the truth of the allegations in Paragraph 35 and deny them on that
7 basis.

8 36. Federal Defendants lack information and knowledge sufficient to form
9 a belief as to the truth of the allegations in the two sentences of Paragraph 36 and
10 deny them on that basis.

11 37. Federal Defendants lack information and knowledge sufficient to form
12 a belief as to the truth of the allegations in Paragraph 37 and deny them on that
13 basis.

14 38. Federal Defendants lack information and knowledge sufficient to form
15 a belief as to the truth of the allegations in Paragraph 38 and deny them on that
16 basis.

17 39. Federal Defendants admit the allegations in Paragraph 39.

18 40. Federal Defendants admit the allegations in Paragraph 40.

19 41. Federal Defendants admit the allegations in Paragraph 41.

20 **STATUTORY BACKGROUND**

21 42. The allegations in Paragraph 42 purport to characterize the Outer
22 Continental Shelf Lands Act, which speaks for itself and is the best evidence of its
23 contents. Any allegations contrary to the plain language are denied.

24 43. The allegations in Paragraph 43 purport to characterize 43 U.S.C. §§
25 1332(3), 1802(2), which speak for themselves and are the best evidence of their
26 contents. Any allegations contrary to the plain language are denied.

27 44. The allegations in Paragraph 44 purport to characterize the Supreme
28 Court's decision in *Sec'y of the Interior v. California*, 464 U.S. 312 (1984), which

1 speaks for itself and is the best evidence of its contents. Any allegations contrary to
2 the plain language are denied.

3 45. The allegations in Paragraph 45 purport to characterize 43 U.S.C. §§
4 1337(a)(1), 1337(b)(4), which speak for themselves and are the best evidence of
5 their contents. Any allegations contrary to the plain language are denied.

6 46. The allegations in Paragraph 46 purport to characterize 43 U.S.C. §§
7 1337(b)(2)(A), 1337(b)(2), which speak for themselves and are the best evidence
8 of their contents. Any allegations contrary to the plain language are denied.

9 47. The allegations in Paragraph 47 purport to characterize 43 U.S.C. §
10 1334(a), of the Outer Continental Shelf Lands Act, which speaks for itself and is
11 the best evidence of its contents. Any allegations contrary to the plain language are
12 denied.

13 48. The allegations in Paragraph 48 purport to characterize 43 U.S.C. §
14 1334(a)(1) of the Outer Continental Shelf Lands Act, which speaks for itself and is
15 the best evidence of its contents. Any allegations contrary to the plain language are
16 denied.

17 49. The allegations in Paragraph 49 purport to characterize regulations at
18 30 C.F.R. § 550.101 and 30 C.F.R. § 250.180(e), which speak for themselves and
19 are the best evidence of their contents. Any allegations contrary to the plain
20 language are denied.

21 50. The allegations in Paragraph 50 purport to characterize regulations at
22 30 C.F.R. § 250.180(a)(2) and 30 C.F.R. § 250.180(d), which speak for themselves
23 and are the best evidence of their contents. Any allegations contrary to the plain
24 language are denied.

25 51. The allegations in Paragraph 51 purport to characterize regulations at
26 30 C.F.R. § 250.180(e), which speak for themselves and are the best evidence of
27 their contents. Any allegations contrary to the plain language are denied.
28

1 52. The allegations in the first sentence of Paragraph 52 purport to
2 characterize the regulations at 30 C.F.R. § 250.169(a), which speaks for itself and
3 is the best evidence of its contents. Any allegations contrary to the plain language
4 are denied. The allegations in the second sentence of Paragraph 52 purport to
5 characterize the Ninth Circuit’s decision in *California v. Norton*, 311 F.3d 1162
6 (9th Cir. 2002), which speaks for itself and is the best evidence of its contents. Any
7 allegations contrary to the plain language are denied.

8 53. The allegations in Paragraph 53 purport to characterize regulations at
9 30 C.F.R. § 250.1710 and 30 C.F.R. § 250.1725(a), which speak for themselves
10 and are the best evidence of their contents. Any allegations contrary to the plain
11 language are denied.

12 54. The allegations in Paragraph 54 purport to characterize the National
13 Environmental Policy Act, which speaks for itself and is the best evidence of its
14 contents. Any allegations contrary to the plain language are denied.

15 55. The allegations in Paragraph 55 purport to characterize the Supreme
16 Court’s decision in *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332
17 (1989), which speaks for itself and is the best evidence of its contents. Any
18 allegations contrary to the plain language are denied.

19 56. The allegations in Paragraph 56 purport to characterize 42 U.S.C. §§
20 4332(2)(C) and 4336e(10)(A) of the National Environmental Policy Act, which
21 speak for themselves and are the best evidence of their contents. Any allegations
22 contrary to the plain language are denied.

23 57. The allegations in Paragraph 57 purport to characterize 42 U.S.C. §§
24 4332(2)(C)(i) and 4332(C)(iii) of the National Environmental Policy Act, which
25 speak for themselves and are the best evidence of their contents. Any allegations
26 contrary to the plain language are denied.

27 58. The allegations in Paragraph 58 purport to characterize regulations at
28 40 C.F.R. § 1501.5, which speak for themselves and are the best evidence of its

1 contents. Any allegations contrary to the plain language are denied. Similarly, the
2 allegations in the first sentence of footnote 1 in Paragraph 58 purport to
3 characterize 42 U.S.C. § 4336(b), which speaks for itself and is the best evidence
4 of its contents. Any allegations contrary to the plain language are denied. The
5 allegations in the second sentence of footnote 1 characterize Plaintiffs' legal
6 strategy, to which no response is required.

7 59. The allegations in Paragraph 59 purport to characterize regulations at
8 40 C.F.R. § 250.1501.4 and § 42 U.S.C. § 4336e(1), which speak for themselves
9 and are the best evidence of their contents. Any allegations contrary to the plain
10 language are denied.

11 60. The allegations in Paragraph 60 purport to characterize 516 DM §
12 15.4(C)(7) in DOI's Departmental Manual, which speaks for itself and is the best
13 evidence of its contents. Any allegations contrary to the plain language are denied.

14 61. The allegations in Paragraph 61 purport to characterize 516 DM §
15 15.4(C)(12) and 516 DM § 15.4(C)(14) in DOI's Departmental Manual, which
16 speak for themselves and are the best evidence of their contents. Any allegations
17 contrary to the plain language are denied.

18 62. The allegations in Paragraph 62 purport to characterize 43 C.F.R. §
19 46.205(a) of the National Environmental Policy Act, which speaks for itself and is
20 the best evidence of its contents. Any allegations contrary to the plain language are
21 denied.

22 63. The allegations in Paragraph 63 purport to characterize 43 C.F.R. §
23 46.205(c) of the National Environmental Policy Act, which speaks for itself and is
24 the best evidence of its contents. Any allegations contrary to the plain language are
25 denied.

26 64. The allegations in Paragraph 64 purport to characterize 43 C.F.R. §
27 46.215 of the National Environmental Policy Act, which speaks for itself and is the
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1 best evidence of its contents. Any allegations contrary to the plain language are
2 denied.

3 65. Federal Defendants lack information and knowledge sufficient to form
4 a belief as to the truth of the allegations in Paragraph 65 and deny them on that
5 basis.

6 66. The allegations in Paragraph 66 purport to characterize 42 U.S.C. §
7 4332(2)(D)–(E) of the National Environmental Policy Act, which speaks for itself
8 and is the best evidence of its contents. Any allegations contrary to the plain
9 language are denied.

10 67. The allegations in Paragraph 67 purport to characterize the Ninth
11 Circuit’s decisions in *Pit River Tribe v. U.S. Forest Serv.*, 469 F.3d 768, 785–86
12 (9th Cir. 2006) and *Metcalf v. Daley*, 214 F.3d 1135, 1142 (9th Cir. 2000), which
13 speak for themselves and are the best evidence of their contents. Any allegations
14 contrary to the plain language are denied.

15 68. The allegations in the first sentence of Paragraph 68 are legal
16 conclusions to which no response is required. To the extent a response is required,
17 Federal Defendants deny the allegations. The allegations in the second sentence of
18 Paragraph 68 purport to characterize 42 U.S.C. § 4336b(2), which is the best
19 evidence of its contents. Any allegations contrary to the plain language are denied.

20 69. The allegations in Paragraph 69 purport to characterize regulations at
21 40 C.F.R. § 1502.9(d)(1) and § 1502.9(d)(2), which speak for themselves and are
22 the best evidence of their contents. Any allegations contrary to the plain language
23 are denied. Footnote 2 purports to characterize *California v. Norton*, 311 F.3d 1162
24 at 1167, 1173 n.2 (9th Cir. 2002), *Marsh v. Or. Nat. Res. Def. Council*, 490 U.S.
25 360, 370–74 (1989), and Departmental Manual, 516 DM 1 § 3.6, which are the
26 best evidence of their contents. Any allegations contrary to the plain language are
27 denied.
28

1 70. The allegations in Paragraph 70 purport to characterize the
2 Administrative Procedure Act, and specifically 5 U.S.C. §§ 706(2)(A), (D) which
3 speak for themselves and are the best evidence of their contents. Any allegations
4 contrary to the plain language are denied.

5 71. The allegations in Paragraph 71 purport to characterize 5 U.S.C. §
6 706(1) of the Administrative Procedure Act, which speaks for itself and is the best
7 evidence of its contents. Any allegations contrary to the plain language are denied.

8 **FACTUAL BACKGROUND**

9 72. Federal Defendants admit the allegations in Paragraph 72.

10 73. Federal Defendants admit the allegations in Paragraph 73.

11 74. Federal Defendants admit the allegations in Paragraph 74.

12 75. Federal Defendants admit the allegations in the first sentence of
13 Paragraph 75. The allegations in the second sentence of Paragraph 75 purport to
14 characterize ExxonMobil's development plan for the Santa Ynez Unit, which
15 speaks for itself and is the best evidence of its contents. Any allegations contrary to
16 the plain language are denied. Federal Defendants admit in the third sentence of
17 Paragraph 75 that production began in 1981 but deny the remainder of the
18 allegations in Paragraph 75. Federal Defendants admit the allegations in the fourth
19 sentence of Paragraph 75.

20 76. Federal Defendants aver that BSEE's records indicate that Sable
21 Offshore Corp. is the lessee and operator of Platforms Harmony, Heritage, and
22 Hondo and lessee on the leases in the Santa Ynez Unit. Federal Defendants
23 otherwise admit the allegations in Paragraph 76.

24 77. Federal Defendants admit that the change in ownership occurred after
25 the May 20, 2015, oil spill and deny the remainder of the allegations in the first
26 sentence of Paragraph 77. The allegations in the second sentence of Paragraph 77
27 are vague and ambiguous. Federal Defendants therefore lack knowledge or
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1 information sufficient to form a belief about the truth of the allegation and deny
2 them on that basis.

3 78. The allegations in Paragraph 71 are vague and ambiguous. Federal
4 Defendants therefore lack knowledge or information sufficient to form a belief
5 about the truth of the allegations and deny them on that basis.

6 79. Federal Defendants admit the allegations in the first and second
7 sentences of Paragraph 79. The third sentence purports to characterize statements
8 operators of the other offshore platforms, which speak for themselves and are the
9 best evidence of their contents. Any allegations contrary to the plain language are
10 denied. Federal defendants lack knowledge or information sufficient to form a
11 belief about the truth of the allegations in the fourth sentence of Paragraph 79 and
12 deny them on that basis.

13 80. The allegations in the first two sentences of Paragraph 80 purport to
14 characterize lease extension requests from Exxon and subsequent approvals by
15 BSEE, which speak for themselves and are the best evidence of their contents. All
16 allegations inconsistent with the plain language are denied. Federal Defendants
17 admit the third sentence in Paragraph 80. The allegations in the fourth and fifth
18 sentences of Paragraph 80 are legal conclusions, to which no response is required.
19 The allegations in the first clause of the sixth sentence purport to characterize
20 statements made by Sable, which speak for themselves, and the allegations in the
21 second clause of the sixth sentence are legal conclusions to which no response is
22 required. Federal Defendants deny the allegations in the seventh sentence of
23 Paragraph 80.

24 81. Federal Defendants admit the allegations in the first sentence of
25 Paragraph 81. Federal Defendants lack knowledge or information sufficient to
26 form a belief about the truth of the allegations in the second sentence of Paragraph
27 81 and deny them on that basis.

1 82. Federal Defendants lack knowledge or information sufficient to form
2 a belief about the truth of the allegations in Paragraph 82 and deny them on that
3 basis.

4 83. Federal Defendants lack knowledge or information sufficient to form
5 a belief about the truth of the allegations in Paragraph 83 and deny them on that
6 basis. The allegations in Footnote 3 in Paragraph 83 purport to characterize a report
7 filed by Sable with the Security and Exchange Commission, which speaks for itself
8 and is the best evidence of its contents. Any allegations contrary to the plain
9 language of the report are denied. Federal Defendants admit the allegations in the
10 last sentence of Footnote 3.

11 84. Federal Defendants deny the allegations in Paragraph 84.

12 85. Federal Defendants admit the allegations in Paragraph 85.

13 86. The allegations in Paragraph 86 purport to characterize BSEE's NEPA
14 categorical exclusion review of the relevant APMs, which speaks for itself and is
15 the best evidence of its contents. Any allegations contrary to the plain language are
16 denied.

17 87. The allegations in Paragraph 87 are vague and ambiguous. Federal
18 Defendants therefore lack knowledge or information sufficient to form a belief
19 about the truth of the allegations and deny them on that basis.

20 88. Federal Defendants admit the allegations in Paragraph 88.

21 89. Federal Defendants admit in the first sentence of Paragraph 89 that
22 BSEE filed a motion for voluntary remand on December 20, 2024, based on
23 concerns regarding potential deficiencies in its 2023 extension decision and
24 supporting analysis, but deny the remaining allegations in Paragraph 89. The
25 allegations in the second sentence of Paragraph 89 constitutes a conclusion of law
26 to which no response is required. To the extent a response is required, Federal
27 Defendants deny the allegations. The third sentence in Paragraph 89 purports to
28 characterize the court's March 21, 2025, decision, which speaks for itself and is the

1 best evidence of its contents. Any allegations contrary to the plain language of the
2 Court's decision are denied.

3 90. The allegations in Paragraph 90 purport to characterize a May 19,
4 2025, announcement by Sable, which speaks for itself and is the best evidence of
5 its contents. Any allegations contrary to the plain language of the announcement
6 are denied.

7 91. Federal Defendants admit that on May 28, 2025, BSEE issued an
8 EA/FONSI evaluating the environmental impacts of issuing the Santa Ynez Unit
9 lease extensions; that on May 29, 2025, BSEE issued a decision re-evaluating its
10 prior approval of the 2023 lease extension decision relying on information in the
11 EA/FONSI; and that the 2025 decision reaffirms BSEE's 2023 lease extensions
12 decision, concluding that granting the lease extensions is in the national interest.
13 The remainder of the allegations in Paragraph 91 are denied.

14 92. Federal Defendants admit the allegations in Paragraph 92.

15 93. Paragraph 93 purports to characterize a July 25, 2025, press release by
16 the Department of the Interior, which speaks for itself and is the best evidence of
17 its contents. Any allegations contrary to the plain language of the press release are
18 denied.

19 94. Federal Defendants lack knowledge or information sufficient to form
20 a belief about the truth of the allegations in the first sentence of Paragraph 94 and
21 deny them on that basis. The allegations in the second sentence of Paragraph 94
22 purport to characterize a September 27, 2024, notice issued by the California
23 Coastal Commission, which speaks for itself and is the best evidence of its
24 contents. Any allegations contrary to the plain language of the notice are denied.
25 Federal Defendants lack knowledge or information sufficient to form a belief about
26 the truth of the allegations in the first clause of the third sentence of Paragraph 94
27 and deny them on that basis. The remaining allegations in the third sentence of
28 Paragraph 94 purport to characterize an October 4, 2024, letter sent by the

1 California Coastal Commission, which speaks for itself and is the best evidence of
2 its contents. Any allegations contrary to the plain language of the letter are denied.
3 The allegations in the fourth and fifth sentences of Paragraph 94 purport to
4 characterize a November 12, 2024, cease-and-desist order issued by the California
5 Coastal Commission, which speaks for itself and is the best evidence of its
6 contents. Any allegations contrary to the plain language of the order are
7 denied. The allegations in the sixth sentence of Paragraph 94 purport to
8 characterize a February 18, 2025, cease-and-desist order issued by the California
9 Coastal Commission, which speaks for itself and is the best evidence of its
10 contents. Any allegations contrary to the plain language of the order are denied.
11 Federal Defendants lack knowledge or information sufficient to form a belief about
12 the truth of the allegations in the seventh and eighth sentences of Paragraph 94 and
13 deny them on that basis. The allegations in the ninth sentence of Paragraph 94
14 purport to characterize an October 2025 ruling by a Santa Barbara County Superior
15 Court judge, which speaks for itself and is the best evidence of its contents. Any
16 allegations contrary to the plain language of the ruling are denied.

17 95. Federal Defendants lack knowledge or information sufficient to form
18 a belief about the truth of the allegations in the first sentence of Paragraph 95 and
19 deny them on that basis. The allegations in the second sentence of Paragraph 95
20 purport to characterize a September 26, 2024, letter to Sable from the California
21 Geologic Energy Management Division, which speaks for itself and is the best
22 evidence of its contents. Any allegations contrary to the plain language of the letter
23 are denied. The allegations in the third sentence of Paragraph 95 purport to
24 characterize a December 13, 2024, violation and non-compliance notices issued to
25 Sable by the Central Coast Regional Water Quality Control Board, which speaks
26 for itself and is the best evidence of its contents. Any allegations contrary to the
27 plain language of the notice are denied. The allegations in the fourth sentence of
28 Paragraph 95 purport to characterize a December 17, 2024, notice of violation

1 issued to Sable by the California Department of Fish and Wildlife, which speaks
2 for itself and is the best evidence of its contents. Any allegations contrary to the
3 plain language of the notice are denied.

4 96. The allegations in Paragraph 96 purport to characterize criminal
5 charges filed against Sable by the Santa Barbara County District Attorney, which
6 speak for themselves and are the best evidence of their contents. Any allegations
7 contrary to the plain language of the charges are denied.

8 97. The allegations in Paragraph 97 purport to characterize charges filed
9 against Sable by the California Attorney General, which speak for themselves and
10 are the best evidence of their contents. Any allegations contrary to the plain
11 language of the charges are denied.

12 98. Federal Defendants lack knowledge or information sufficient to form
13 a belief about the truth of the allegations Paragraph 98 and deny them on that basis.

14 99. The allegations in Paragraph 99 are vague and ambiguous. Federal
15 Defendants therefore lack knowledge or information sufficient to form a belief
16 about the truth of the allegations and deny them on that basis.

17 100. Federal Defendants deny the allegations in the first two sentences of
18 Paragraph 100 but aver that certain oil and gas activities inherently present a risk
19 of oil spills and those risks are minimized through proper monitoring, maintenance,
20 and BSEE oversight of operations and facilities. With respect to the allegations in
21 sentences three through seven of Paragraph 100, Federal Defendants admit that oil
22 spills can cause various forms of environmental harm. Federal Defendants lack
23 information and knowledge sufficient to form a belief as to the truth of Plaintiffs'
24 remaining allegations in sentences three through seven of Paragraph 100 and deny
25 them on that basis.

26 101. The allegations in the first sentence of Paragraph 101 are vague and
27 ambiguous. Federal Defendants therefore lack knowledge or information sufficient
28 to form a belief about the truth of the allegations and deny them on that basis.

1 However, Federal Defendants aver that some degree of exposure to oil could have
2 adverse effects on fish. Federal Defendants otherwise lack information and
3 knowledge sufficient to form a belief as to the truth of the allegations in Paragraph
4 101 and deny them on that basis.

5 102. Federal Defendants aver that, depending on the specific circumstances
6 of an oil spill event at the Santa Ynez Unit, the species Plaintiff identifies could be
7 susceptible. Federal Defendants otherwise deny the allegations in Paragraph 102.

8 103. Federal Defendants deny the allegations in the first and third
9 sentences of Paragraph 103 and admit the allegations in the second sentence of
10 Paragraph 103.

11 104. Federal Defendants deny the allegations in the first sentence of
12 Paragraph 104 but aver that oil spill and accident risks are presented by certain oil
13 and gas activities and can be minimized through proper monitoring, maintenance,
14 and BSEE oversight of wells and facilities. Federal Defendants deny the
15 allegations in the second sentence of Paragraph 104, and aver that the Plains All
16 American Pipeline was not in the Santa Ynez Unit. The allegations in the third
17 sentence of Paragraph 104 purport to characterize the environmental analysis
18 prepared by the Bureau of Land Management and California State Lands
19 Commission in 1985, which speaks for itself and is the best evidence of its
20 contents. Federal Defendants deny any allegations contrary to the plain language of
21 that analysis.

22 105. The allegations in sentences 1 through 5 of Paragraph 105 purport to
23 characterize certain unidentified studies. Federal Defendants thus lack information
24 and knowledge sufficient to form a belief as to the truth of the allegations in these
25 sentences and deny them on that basis. The allegations in the sixth sentence of
26 Paragraph 105 purport to characterize Pipeline and Hazardous Materials Safety
27 Administration's pipeline risk indicator, which speaks for itself and is the best
28 evidence of its contents. Any allegations contrary to the plain language are denied.

1 106. Federal Defendants lack information and knowledge sufficient to form
2 a belief as to the truth of the allegations in Paragraph 106 and deny them on that
3 basis.

4 107. The allegations in Paragraph 107 purport to characterize certain
5 unidentified federal records. Federal Defendants lack information and knowledge
6 sufficient to form a belief as to the truth of the allegations in Paragraph 107 and
7 deny them on that basis.

8 108. Federal Defendants admit the allegations in the first sentence of
9 Paragraph 108. The allegations in the second and third sentences of Paragraph 108
10 are vague and ambiguous. Federal Defendants therefore lack knowledge or
11 information sufficient to form a belief about the truth of the allegations and deny
12 them on that basis. The allegations in the fourth sentence of Paragraph 108 purport
13 to characterize a statement by ExxonMobil without further identifying information.
14 Federal Defendants thus lack information and knowledge sufficient to form a belief
15 as to the truth of the allegations in the fourth sentence of Paragraph 108 and deny
16 them on that basis.

17 109. Federal Defendants aver that certain activities associated with oil and
18 gas production can emit fine particulate matter and volatile organic compounds but
19 otherwise deny the allegations in the first sentence of Paragraph 109. The second
20 sentence in Paragraph 109 amounts to a legal conclusion that requires no response.
21 Federal Defendants lack information and knowledge sufficient to form a belief as
22 to the truth of the allegations in the third, fourth, and fifth sentences in Paragraph
23 109 and deny them on that basis.

24 110. Federal Defendants aver that oil and gas drilling can involve the
25 discharge of drilling muds and cuttings, produced wastewater, and/or well
26 treatment and workover fluids but otherwise deny the allegations in the first
27 sentence of Paragraph 110. The allegations in the second sentence of Paragraph
28 110 purport to characterize a NDPS permit issued by the US EPA for oil and gas

1 exploration, development, and production facilities on the California Outer
2 Continental Shelf, which speaks for itself and is the best evidence of its contents.
3 Federal Defendants deny any allegations contrary to the plain language. The
4 allegations in the third sentence of Paragraph 110 are vague and ambiguous are
5 vague and ambiguous. Federal Defendants therefore lack knowledge or
6 information sufficient to form a belief about the truth of the allegations and deny
7 them on that basis.

8 111. The allegations in the first and second sentences of Paragraph 111 are
9 vague and ambiguous and Federal Defendants therefore lack knowledge or
10 information sufficient to form a belief as to their truth and deny them on that basis.
11 Federal Defendants admit the allegations in the third and fourth sentences of
12 Paragraph 111. Federal Defendants lack information and knowledge sufficient to
13 form a belief as to the truth of the allegations in the fifth sentence in Paragraph 111
14 and deny them on that basis.

15 112. Federal Defendants aver that oil and gas activities can involve and
16 lead to the burning of fossil fuels, which contributes to climate change. The
17 allegations in the first sentence of Paragraph 112 are otherwise vague and
18 ambiguous. Federal Defendants therefore lack knowledge or information sufficient
19 to form a belief about the truth of the allegation and deny them on that basis.
20 Federal Defendants lack information and knowledge sufficient to form a belief as
21 to the truth of the allegations in the remaining sentences in Paragraph 112 and deny
22 them on that basis.

23 113. The allegations in Paragraph 113 purport to characterize various
24 BSEE decisions and ExxonMobil applications, which speak for themselves and are
25 the best evidence of their contents. Federal Defendants deny any allegations
26 inconsistent with the plain language, meaning, and context of those documents.
27 With respect to the allegations in the last sentence of Paragraph 113, Defendants
28

1 admit that the lease extension granted to ExxonMobil on November 14, 2023,
2 expired at midnight on December 13, 2024.

3 114. The allegations in Paragraph 114 purport to characterize BSEE's
4 November 2023 decision to grant an extension, which speaks for itself and is the
5 best evidence of its contents. Any allegations contrary to the plain language of that
6 decision are denied.

7 115. The allegations in Paragraph 115 purport to characterize BSEE's
8 November 2023 decision to grant an extension, which speaks for itself and is the
9 best evidence of its contents. Any allegations contrary to the plain language of the
10 decision are denied.

11 116. The allegations in Paragraph 116 purport to characterize BSEE's
12 November 2023 decision to grant an extension, which speaks for itself and is the
13 best evidence of its contents. Any allegations contrary to the plain language of the
14 decision are denied.

15 117. The allegations in Paragraph 117 purport to characterize BSEE's
16 November 2023 decision to grant an extension, which speaks for itself and is the
17 best evidence of its contents. Any allegations contrary to the plain language of the
18 decision are denied.

19 118. Federal Defendants admit the allegations in Paragraph 118.

20 119. The allegations in Paragraph 119 purport to characterize BSEE's
21 categorical exclusion review, which speaks for itself and is the best evidence of its
22 contents. Any allegations contrary to the plain language of the review are denied.

23 120. The allegations in Paragraph 120 purport to characterize BSEE's
24 categorical exclusion review, which speaks for itself and is the best evidence of its
25 contents. Any allegations contrary to the plain language of the review are denied.

26 121. The allegations in Paragraph 121 purport to characterize BSEE's
27 categorical exclusion review, which speaks for itself and is the best evidence of its
28 contents. Any allegations contrary to the plain language of the review are denied.

1 122. The allegations in Paragraph 122 purport to characterize BSEE's
2 categorical exclusion review, which speaks for itself and is the best evidence of its
3 contents. Any allegations contrary to the plain language of the review are denied.

4 123. The allegations in Paragraph 123 purport to characterize BSEE's
5 categorical exclusion review, which speaks for itself and is the best evidence of its
6 contents. Any allegations contrary to the plain language of the review are denied.

7 124. The allegations in Paragraph 124 purport to characterize BSEE's
8 categorical exclusion review, which speaks for itself and is the best evidence of its
9 contents. Any allegations contrary to the plain language of the review are denied.

10 125. Federal Defendants deny the allegations in Paragraph 125.

11 126. The allegations in the first sentence of Paragraph 126 purport to
12 characterize a February 2023 letter from Plaintiffs to BSEE, which speaks for itself
13 and is the best evidence of its contents. Any allegations contrary to the plain
14 language of the letter are denied. BSEE denies the allegations in the second
15 sentence of Paragraph 126. BSEE admits the allegations in the third sentence of
16 Paragraph 126.

17 127. Federal Defendants admit the allegations in Paragraph 127.

18 128. Federal Defendants admit the allegations in Paragraph 128.

19 129. The allegations in the first two sentences of Paragraph 129 are legal
20 conclusions that require no response. To the extent a response is required, Federal
21 Defendants deny the allegations. Federal Defendants admit that BSEE relied on a
22 categorical exclusion to approve Sable's Applications for Permits to Modify
23 (APMs).

24 130. The allegations in Paragraph 130 purport to characterize BSEE's
25 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs and
26 516 DM § 15.4(C)(12), which speak for themselves and are the best evidence of
27 their contents. Any allegations contrary to the plain language of the reviews are
28 denied.

1 131. The allegations in Paragraph 131 purport to characterize BSEE's
2 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which
3 speak for themselves and are the best evidence of their contents. Any allegations
4 contrary to the plain language of the reviews are denied.

5 132. The allegations in Paragraph 132 are legal conclusions to which no
6 response is required. To the extent a response is required, Federal Defendants deny
7 the allegations in Paragraph 132.

8 133. Federal Defendants deny the allegations in Paragraph 133.

9 134. The allegations in Paragraph 134 are legal conclusions that do not
10 require a response. To the extent a response is required, the allegations are denied.

11 135. The allegations in Paragraph 135 purport to characterize BSEE's
12 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which
13 are the best evidence of their contents. Any allegations contrary to the plain
14 language of the reviews are denied.

15 136. The allegations in Paragraph 136 purport to characterize BSEE's
16 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which
17 are the best evidence of their contents. Any allegations contrary to the plain
18 language of the reviews are denied.

19 137. The allegations in Paragraph 137 purport to characterize BSEE's
20 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which
21 are the best evidence of their contents. Any allegations contrary to the plain
22 language of the reviews are denied.

23 138. The allegations in Paragraph 138 purport to characterize BSEE's
24 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which
25 are the best evidence of their contents. Any allegations contrary to the plain
26 language of the reviews are denied.

27 139. The allegations in Paragraph 139 purport to characterize BSEE's
28 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which

1 are the best evidence of their contents. Any allegations contrary to the plain
2 language of the reviews are denied.

3 140. The allegations in Paragraph 140 purport to characterize BSEE's
4 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which
5 are the best evidence of their contents. Any allegations contrary to the plain
6 language of the reviews are denied.

7 141. The allegations in Paragraph 141 purport to characterize BSEE's
8 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which
9 are the best evidence of their contents. Any allegations contrary to the plain
10 language of the reviews are denied.

11 142. The allegations in Paragraph 142 purport to characterize BSEE's
12 analysis in its NEPA Categorical Exclusion Reviews for the relevant APMs, which
13 are the best evidence of their contents. Any allegations contrary to the plain
14 language of the reviews are denied.

15 143. The allegations in the first sentence of Paragraph 143 are vague and
16 ambiguous. Federal Defendants therefore lack knowledge or information sufficient
17 to form a belief about the truth of the allegations and deny them on that basis.
18 Federal Defendants deny the allegations in the second sentence of Paragraph 143.

19 144. Federal Defendants admit the allegations in the first sentence of
20 Paragraph 144. The second sentence of Paragraph 144 purports to characterize a
21 July 24, 2025, APM, which speaks for itself and is the best evidence of its contents.
22 Any allegations contrary to the plain language of the APM are denied.

23 145. The allegations in the first and second sentences of Paragraph 145
24 purport to characterize BSEE's analysis in its NEPA Categorical Exclusion
25 Reviews for the 2023 lease extensions and 2024 APMs, which are the best
26 evidence of their contents. Any allegations contrary to the plain language of the
27 reviews are denied. Federal Defendants admit that there was an oil spill from an
28 onshore pipeline associated with the Santa Ynez Unit in 2015 but lack information

1 and knowledge sufficient to form a belief as to the truth of the allegations in the
2 third and fourth sentences of Paragraph 145 and deny them on that basis. The
3 allegations in the fifth sentence of Paragraph 145 are vague and ambiguous.
4 Federal Defendants therefore lack knowledge or information sufficient to form a
5 belief about the truth of the allegations and deny them on that basis. The
6 allegations in the sixth sentence of Paragraph 145 purport to characterize
7 unidentified analyses by Sable. Federal Defendants thus lack information and
8 knowledge sufficient to form a belief as to the truth of the allegations in the sixth
9 sentence of Paragraph 145 and deny them on that basis.

10 146. Federal Defendants deny the allegations in the first sentence of
11 Paragraph 146. The second and third sentences of Paragraph 146 purports to
12 characterize the 1975 EIS for “Oil and Gas Development in the Santa Barbara
13 Channel, Outer Continental Shelf off California,” which is the best evidence of its
14 contents. Any allegations contrary to the plain language are denied.

15 147. Federal Defendants admit the allegations in Paragraph 147.

16 148. The allegations in Paragraph 148 purport to characterize BSEE’s
17 permits for the relevant APMs, which are the best evidence of their contents. Any
18 allegations contrary to the plain language of the permits are denied.

19 149. The allegations in Paragraph 149 purport to characterize certain
20 unidentified environmental assessments. Federal Defendants thus lack information
21 and knowledge sufficient to form a belief as to the truth of the allegations in
22 Paragraph 149 and deny them on that basis.

23 150. Federal Defendants admit in the first sentence of Paragraph 150 that
24 two platforms were constructed more than 35 years ago, and one was constructed
25 nearly 50 years ago but deny the remaining allegations in the first sentence of
26 Paragraph 150. The allegations in the second sentence of Paragraph 150 purport to
27 characterize the development plans and environmental analysis associated with the
28 platforms, which speak for themselves and are the best evidence of their contents.

1 Any allegations contrary to the plain language of the plans and analysis are denied.
2 Federal Defendants deny the allegations in the third sentence of Paragraph 150.

3 151. Federal Defendants admit in the first sentence of Paragraph 151 that
4 restarting the Santa Ynez unit will result in oil production but deny the remaining
5 allegations in that sentence. The allegations in the second and third sentences in
6 Paragraph 151 purport to characterize certain development plans and BSEE
7 reports, which are the best evidence of their contents. Any allegations contrary to
8 the plain language of the development plans and reports are denied.

9 152. The allegations in the first sentence of Paragraph 152 are vague and
10 ambiguous. Federal Defendants therefore lack knowledge or information sufficient
11 to form a belief about the truth of the allegations and deny them on that basis.
12 Federal Defendants admit the allegation in the second sentence that ExxonMobil
13 used extended reach drilling but lacks information and knowledge sufficient to
14 form a belief as to the truth of the remaining allegations in the second sentence of
15 Paragraph 152 and deny them on that basis.

16 153. Federal Defendants admit in the first sentence of Paragraph 153 that a
17 National Marine Sanctuary was designated off coastal Santa Barbara in October
18 2024. The remaining allegations in the first sentence purport to characterize the
19 decision document establishing the Marine Sanctuary, which document speaks for
20 itself and is the best evidence of its contents. Any allegations contrary to its plain
21 language are denied. Federal Defendants admit in the second sentence of
22 Paragraph 153 that the Santa Ynez Unit is adjacent to the National Marine
23 Sanctuary off coastal Santa Barbara but deny the remaining allegations in this
24 sentence.

25 154. The first two sentences of Paragraph 154 purports to characterize
26 certain “old” NEPA analyses and development plans without further identifying
27 such documents. Federal Defendants therefore lack knowledge or information
28 sufficient to form a belief about the truth of the allegations and deny them on that

1 basis. The statements in the third sentence in Paragraph 154 are vague and
2 ambiguous and characterize alleged “new information” and statements by
3 ExxonMobil without further identifying information. Federal Defendants thus lack
4 information and knowledge sufficient to form a belief as to the truth of the
5 allegations in the fourth sentence of Paragraph 108 and deny them on that basis.
6 Federal Defendants lack information and knowledge sufficient to form a belief as
7 to the truth of the allegations in the fourth sentence of Paragraph 154 and deny
8 them on that basis.

9 155. The allegations in Paragraph 155 purport to characterize unnamed
10 NEPA documents. Federal Defendants therefore lack knowledge or information
11 sufficient to form a belief about the truth of the allegations and deny them on that
12 basis.

13 156. The allegations in Paragraph 156 are vague and ambiguous. Federal
14 Defendants therefore lack knowledge or information sufficient to form a belief
15 about the truth of the allegations and deny them on that basis.

16 157. The first sentence in Paragraph 157 amounts to a legal conclusion that
17 requires no response. To the extent a response is required, Federal Defendants deny
18 the allegations. Federal Defendants lack information and knowledge sufficient to
19 form a belief as to the truth of the allegations in the first clause of the second
20 sentence in Paragraph 157 and deny them on that basis. Federal Defendants admit
21 in the second clause of the second sentence in Paragraph 157 that it has issued
22 permits. In the last clause of the second sentence in Paragraph 157, Federal
23 Defendants admit that BSEE will review permit requests associated with the Santa
24 Ynez Unit according to the facts and law to determine whether they should be
25 approved or denied and deny the remaining allegations in the last clause of the
26 second sentence in Paragraph 157.

27 158. Federal Defendants admit the allegations in Paragraph 158.
28

1 159. Federal Defendants admit that oil and gas activity has occurred at the
2 Santa Ynez Unit but deny the remaining allegations in Paragraph 159.

3 160. The allegations in Paragraph 160 purport to characterize BSEE's 2025
4 Santa Ynez Unit lease extensions EA/FONSI, which are the best evidence of their
5 contents. Any allegations contrary to the plain language of the EA/FONSI are
6 denied.

7 161. Federal Defendants deny the allegations in the first and third sentence
8 of Paragraph 161. Federal Defendants admit that BSEE issued the EA/FONSI after
9 issuing the 2023 lease extension decision and after filing for a motion for remand
10 to correct possible flaws in its environmental reviews. BSEE also admits that it did
11 not choose to rely on its discretion to halt any further development during the
12 preparation of the EA/FONSI. Federal Defendants deny the remaining allegations
13 in the second sentence of Paragraph 161.

14 162. Federal Defendants deny the allegations in the Paragraph 162.

15 163. The allegations in Paragraph 163 purport to characterize the 2025
16 EA/FONSI and Sable's January 2025 Oil Spill Response Plan, which are the best
17 evidence of their contents. Any allegations contrary to the plain language of the
18 EA/FONSI and Oil Spill Response Plan are denied.

19 164. The allegations in Paragraph 164 purport to characterize the 2025
20 EA/FONSI and the Oil Spill Risk Assessment attached as Appendix A, which are
21 the best evidence of their contents. Any allegations contrary to the plain language
22 of the EA/FONSI and Oil Spill Risk Assessment are denied.

23 165. The allegations in Paragraph 165 purport to characterize the 2025
24 EA/FONSI, which is the best evidence of its contents. Any allegations contrary to
25 the plain language are denied.

26 166. The allegations in Paragraph 166 purport to characterize the 2025
27 EA/FONSI, which is the best evidence of its contents. Any allegations contrary to
28 the plain language of the EA/FONSI are denied.

1 167. Regarding the allegations in the first sentence of Paragraph 167,
2 Federal Defendants admit that the 2025 decision re-affirming the 2023 lease
3 extensions was based in part on the 2025 EA/FONSI. Federal Defendants deny the
4 remaining allegations Paragraph 167.

5 168. Federal Defendants deny the allegations in Paragraph 168.

6 **CLAIMS FOR RELIEF**

7 **First Claim for Relief**

8 169. Federal Defendants incorporate by reference their responses to
9 Paragraphs 1 through 168.

10 170. The allegations in Paragraph 170 purport to characterize provisions of
11 OCSLA, which speak for themselves and are the best evidence of their
12 contents. Any allegations contrary to the plain language of the statute are denied.

13 171. The allegations in Paragraph 171 purport to characterize OCSLA and
14 its implementing regulations, which speak for themselves and are the best evidence
15 of their contents. Any allegations contrary to the plain language of the statute and
16 regulations are denied.

17 172. The allegations in Paragraph 172 purport to characterize OCSLA's
18 implementing regulations, which speak for themselves and are the best evidence of
19 their contents. Any allegations contrary to the plain language of the regulations are
20 denied.

21 173. The allegations in Paragraph 173 purport to characterize BSEE's
22 November 2023 decision to grant an extension, which speaks for itself and is the
23 best evidence of its contents. Any allegations contrary to the plain language of the
24 decision are denied.

25 174. Federal Defendants deny the allegations in Paragraph 174.

26 **Second Claim for Relief**

27 175. Federal Defendants incorporate by reference their responses to
28 Paragraphs 1 through 168.

1 176. The allegations in Paragraph 176 purport to characterize provisions in
2 NEPA and related regulatory provisions, which speak for themselves and are the
3 best evidence of their contents. Any allegations contrary to the plain language of
4 the statute and regulations are denied.

5 177. The allegations in Paragraph 177 are conclusions of law that require
6 no response. To the extent a response is required, Federal Defendants deny the
7 allegations.

8 178. Federal Defendants deny the allegations in the first and fourth
9 sentences of Paragraph 178. Federal Defendants admit the allegations in the second
10 and third sentences of Paragraph 178

11 179. Federal Defendants deny the allegations in Paragraph 179.

12 180. Federal Defendants deny the allegations in the first sentence of
13 Paragraph 180. The allegations in the second, fourth, and fifth sentences of
14 Paragraph 180 purport to characterize BSEE's 2023 extraordinary circumstances
15 review and 2023 lease extension decision, which speak for themselves and are the
16 best evidence of their contents. Any allegations contrary to the plain language are
17 denied. Federal Defendants deny the allegations in the third sentence of Paragraph
18 180.

19 181. The allegations in Paragraph 181 purport to characterize BSEE's 2025
20 EA/FONSI, 2025 extension decision, and ExxonMobil's lease extension
21 applications, , which speak for themselves and are the best evidence of their
22 contents. Any allegations contrary to the plain language of the EA/FONSI,
23 decision, and applications are denied.

24 182. The Federal Defendants deny the allegations in Paragraph 182.

25 **Third Claim for Relief**

26 183. Federal Defendants incorporate by reference their responses to
27 Paragraphs 1 through 168.
28

1 184. The allegations in Paragraph 184 purport to characterize NEPA and
2 related regulations, which speak for themselves and are the best evidence of their
3 contents. Any allegations contrary to the plain language of the statute and
4 regulations are denied.

5 185. The allegations in Paragraph 185 constitute legal conclusions that do
6 not require a response. To the extent a response is required, Federal Defendants
7 deny the allegations.

8 186. The allegations in Paragraph 186 constitute legal conclusions that do
9 not require a response. To the extent a response is required, Federal Defendants
10 deny the allegations.

11 187. Federal Defendants deny the allegations in Paragraph 187.

12 188. Federal Defendants deny the allegations in Paragraph 188.

13 189. Federal Defendants deny the allegations in Paragraph 189.

14 190. Federal Defendants deny the allegations in the first sentence of
15 Paragraph 190. The allegations in the second and fourth sentences of Paragraph
16 190 purport to characterize BSEE's analysis in its NEPA Categorical Exclusion
17 Reviews for the relevant APMs, which speaks for itself and is the best evidence of
18 its contents. Any allegations contrary to the plain language of the reviews are
19 denied. Federal Defendants deny the allegations in the third and fifth sentences of
20 Paragraph 190.

21 191. Federal Defendants deny the allegations in Paragraph 191.

22 192. Federal Defendants deny the allegations in Paragraph 192.

23 **Fourth Claim for Relief**

24 193. Federal Defendants incorporate by reference their responses to
25 Paragraphs 1 through 168.

26 194. The allegations in Paragraph 194 purport to characterize the NEPA
27 and related regulations, which speak for themselves and are the best evidence of
28

1 their contents. Any allegations contrary to the plain language of the statute and
2 regulations are denied.

3 195. The allegations in Paragraph 195 purport to characterize the NEPA
4 and related regulations, which speak for themselves and are the best evidence of
5 their contents. Any allegations contrary to the plain language of the statute and
6 regulations are denied.

7 196. The allegations in Paragraph 196 are legal conclusions that require no
8 response. To the extent a response is required, Federal Defendants deny the
9 allegations.

10 197. Federal Defendants deny the allegations in the first sentence of
11 Paragraph 197. Federal Defendants deny the first clause in the second sentence of
12 Paragraph 197. Federal Defendants admit the second and third clauses in the
13 second sentence of Paragraph 197.

14 198. The allegations in the first sentence of Paragraph 198 are vague and
15 ambiguous. Federal Defendants therefore lack knowledge or information sufficient
16 to form a belief about the truth of the allegations and deny them on that basis.
17 Federal Defendants admit the allegations in the second sentence of Paragraph 198.
18 The allegations in the third and fourth sentences of Paragraph 198 purport to
19 characterize the 1975 Santa Barbara Channel EIS and 1984 Santa Ynez Unit EIS,
20 which speak for themselves and are the best evidence of their contents. Any
21 allegations contrary to the plain language of the EIS's are denied.

22 199. The allegations in Paragraph 199 purport to characterize the NEPA
23 and related regulations, which speak for themselves and are the best evidence of
24 their contents. Any allegations contrary to the plain language of the statute and
25 regulations are denied.

26 200. Federal Defendants deny the allegations in Paragraph 200.

27 **Fifth Claim for Relief**
28

1 201. Federal Defendants incorporate by reference their responses to
2 Paragraphs 1 through 168.

3 202. The allegations in Paragraph 202 purport to characterize the
4 provisions of NEPA and the Court's decision in *Baltimore Gas & Elec. Co. v.*
5 *NRDC*, 462 U.S. 87, 97 (1983), which speak for themselves and are the best
6 evidence of their contents. Any allegations contrary to the plain language of the
7 statute and case are denied.

8 203. The allegations in Paragraph 203 purport to characterize NEPA and
9 the Ninth Circuit's decisions in *Env't'l Def. Ctr. v. Bureau of Ocean Energy Mgmt.*,
10 36 F.4th 850 (9th Cir. 2022), *Conservation Nw. v. Sherman*, 715 F.3d 1181, 1188
11 (9th Cir. 2013), and *Ctr. for Biological Diversity v. Bernhardt*, 982 F.3d 723, 734–
12 35 (9th Cir. 2020), which speak for themselves and are the best evidence of their
13 contents. Any allegations contrary to the plain language of the statute and cases are
14 denied.

15 204. Federal Defendants deny the allegations in Paragraph 204.

16 205. Federal Defendants deny the first and third sentences of Paragraph
17 205. Federal Defendants aver that the BSEE issued the EA/FONSI after issuing its
18 2023 lease extension decision but deny the remainder of the allegations in the
19 second sentence of Paragraph 205.

20 206. Federal Defendants deny the allegations in the first, second, and third
21 sentences of Paragraph 206. The allegations in fourth sentence of Paragraph 206
22 purport to characterize the 2025 EA/FONSI, which are the best evidence of their
23 contents. Any allegations contrary to the plain language of the EA/FONSI are
24 denied.

25 207. The allegations in the first two sentences of Paragraph 207 purport to
26 characterize the 2025 EA/FONSI, which are the best evidence of their contents.
27 Any allegations contrary to the plain language of the EA/FONSI are denied.
28 Federal Defendants deny the third sentence in Paragraph 207.

1 208. Federal Defendants deny the allegations in Paragraph 208.

2 209. Federal Defendants deny the allegations in Paragraph 209.

3 210. Federal Defendants deny the allegations in Paragraph 210.

4
5 The remaining allegations in the Complaint constitute Plaintiffs' prayer for
6 relief, to which no response is required. To the extent that a response is required,
7 Federal Defendants deny that Plaintiffs are entitled to the relief requested or to any
8 relief whatsoever.

9 Federal Defendants deny any allegations in the Complaint, whether express
10 or implied, that are not expressly admitted, denied, or qualified above.

11 Federal Defendants request that the Court deny Plaintiffs the relief they
12 request, dismiss Plaintiffs' Complaint with prejudice, and enter judgment for
13 Federal Defendants.

14
15 Respectfully submitted this 24th day of November 2025.

16
17 ADAM R.F. GUSTAFSON, Principal
18 Deputy Assistant Attorney General
19 United States Department of Justice
20 Environment & Natural Resources
Division

21 /s/ Daniel C. Luecke

22 Daniel C. Luecke
23 Trial Attorney (CA Bar 326695)
24 Natural Resources Section
25 P.O. Box 7611, Ben Franklin Station
26 Washington, D.C. 20044
27 (202) 598-7863
(202) 305-0506 (fax)
daniel.luecke@usdoj.gov

28 *Counsel for Federal Defendants*